



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

July 20, 2009

MEMORANDUM

SUBJECT Delfasco Forge Facility
Future Work Priorities

FROM Mark Hansen, Associate Director
Prevention and Response Branch (6SF-R) 

TO Ragan Broyles, Associate Director
Hazardous Waste Enforcement (6EN-H)

Troy Hill, Associate Director
Hazardous Waste Programs (6PD-H)

This memorandum provides the Superfund Division's planned future activities at the Delfasco Forge Facility Site and recommendations to the negotiating team on the use of proceeds from the proposed settlement with Delfasco.

Under Superfund's removal authority and the Action Memorandum signed on March 20, 2008, Superfund will install fans in approximately 12 homes. This estimate consists of the two homes previously identified through air sampling and approximately 10 homes where sampling data suggests an imminent and substantial endangerment exists under the Action Memorandum. This will close out Superfund's activities under the Action Memorandum.

Based on our work at the site we recommend the property owner be required to do the following:

1. Cleanup of the Groundwater Source -- develop potential remediation activities with contingencies based on potential settlement proceeds; and
2. If necessary, install fan systems comparable to systems installed by the Removal Program for future mitigation of homes, recognizing a different fan will be necessary for slab homes.
3. Set aside a portion of the settlement proceeds for operation and maintenance of all fans installed by both the Removal Program and additional RCRA VI mitigation performed under the settlement.

We believe the costs recovered in the bankruptcy settlement should be used to address this work first.